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*Of Attorneys for Defendant Multnomah County*

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

Portland Division

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MULTNOMAH COUNTY'S RESPONSE TO MOTION FOR PRELIMINARY  
INJUNCTION

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DON'T SHOOT PORTLAND, NICHOLAS  
ROBERTS, MICHELLE BELDEN,  
ALEXANDRA JOHNSON,

Plaintiff,

v.

CITY OF PORTLAND and MULTNOMAH  
COUNTY,

Defendants.

Civil No. 3:20-cv-00917-HZ

DECLARATION OF MICHAEL  
CRANK IN SUPPORT OF  
DEFENDANT MULTNOMAH  
COUNTY'S RESPONSE TO MOTION  
FOR PRELIMINARY INJUNCTION

I, Michael Crank, under penalty of perjury, declare as follows:

1) I am a Property Manager for Defendant Multnomah County, Facilities and Properties Division. I am competent to give testimony and I have personal knowledge of everything in this Declaration.

2) I have been with Multnomah County for twenty-two (22) years, and during that time have worked on keeping several of the County's leased and owned properties maintained and operating. Two of the buildings that the County owns and operates in my portfolio are the Multnomah County Justice Center ("MCJC") and the Multnomah County Courthouse. The Justice Center is coded in Facilities Records as B119, and the Courthouse as B101.

3) The County tracks repairs and maintenance of its buildings by building number and task ID number. Since the protests following the death of George Floyd began, facilities staff has been responding to daily requests from the Justice Center and from the Multnomah County

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courthouse for repairs. Due to the extensive damage and safety concerns at the Justice Center, courts have been relocated to the historic Courthouse and minimal public access at this time. Facilities has prioritized repairs on these properties to ensure the buildings are safe for the public, for staff, and for people in the jail.

4) On the evening of May 29<sup>th</sup>, 2020, people broke down the glass security doors and windows at the Justice Center, started a fire inside the building that triggered the sprinkler system, and destroyed and damaged interior office spaces. The damage was substantial and repairs are ongoing to the building, as well as replacing the damaged equipment and office furniture. I am attaching several photos taken of the Justice Center on the morning of May 30, 2020 as **Exhibit 1**.

5) On May 30<sup>th</sup>, 2020, the County installed temporary fencing around the Justice Center between the sidewalk ringing the Justice Center and the surrounding streets of SW Main, Madison, 3<sup>rd</sup>, and 2<sup>nd</sup>, respectively. The City of Portland installed fencing on the other side of SW 3<sup>rd</sup> as well. During the next fifteen days, Facilities regularly responded to the Justice Center to repair portions of the temporary fencing that had been broken or pulled away the previous evening. On June 15<sup>th</sup>, 2020 the City removed the outer fence, and on June 26<sup>th</sup>, 2020, Facilities removed the inner fence.

6) In addition to the fence, Facilities arranged for construction of plywood & OSB sheathing around the Justice Center portico and windows due to constant breaking of the doors and windows each night, to avoid repeats of the damage of May 29<sup>th</sup>, 2020, and to avoid

additional damage to the building that could disrupt jail, county or city operations. Crews have also applied fire retardant coatings to the exterior OSB and plywood.

7) Throughout the last month, Facilities is responding to ongoing damage at both the Justice Center and the Courthouse on a daily basis. We are routinely responding to repair or replace external cameras at the Justice Center that have been painted, covered, or damaged. We are routinely repairing damage to the exterior plywood and OSB sheathing, removing debris and broken glass, repairing electrical, cleaning graffiti, and other damage to the building. Windows have been broken on upper floors of the building, including windows in dormitories and cells that house inmates. I am attaching several photographs of damage to the Justice Center and fencing taken between June 11<sup>th</sup> and June 28<sup>th</sup>, 2020, as **Exhibit 2**.

8) Additionally, there has been significant damages to the Multnomah County Courthouse across the park from the Justice Center. We have repeated calls for broken windows, graffiti, and another security camera that was painted over. Following the Fourth of July, crews reported multiple broken windows and smoke bombs inside lower office rooms at the Courthouse. I am attaching several photographs of damage to the Multnomah County Courthouse as **Exhibit 3**.

9) County Facilities and Property Management has performed some of these repairs internally and tracked the cost, and has also hired third-party vendors for items like boarding up the Justice Center Portico, water restoration, fencing, equipment, and debris hauling. As of June 29<sup>th</sup>, 2020, Facilities Property Management has posted expenses associated with repairs to the Courthouse and Justice Center of \$113,820.

10) It is too early to provide a total firm estimate on the damage costs for the Justice Center and the Courthouse given the nightly damage to the buildings and the incoming invoices for labor and services. Outstanding invoices include costs for new cameras to replace damaged or broken cameras, for costs of applying fire retardant materials to exterior plywood of the Justice Center given attempts to start fires, lift rentals to repair broken windows, lighting rentals, et cetera. Our estimation is that damage repair costs will exceed \$284,000, with damages occurring every night requiring increased repairs. As an example, on Friday July 3, 2020, fifteen more windows were smashed at the Multnomah County Courthouse.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

DATED this 6th day of July, 2020.

Michael Crank











**Exhibit 1**  
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**Exhibit 1**  
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**Exhibit 1**  
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**Exhibit 1**  
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Exhibit 1  
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**Exhibit 1**  
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**Exhibit 2**  
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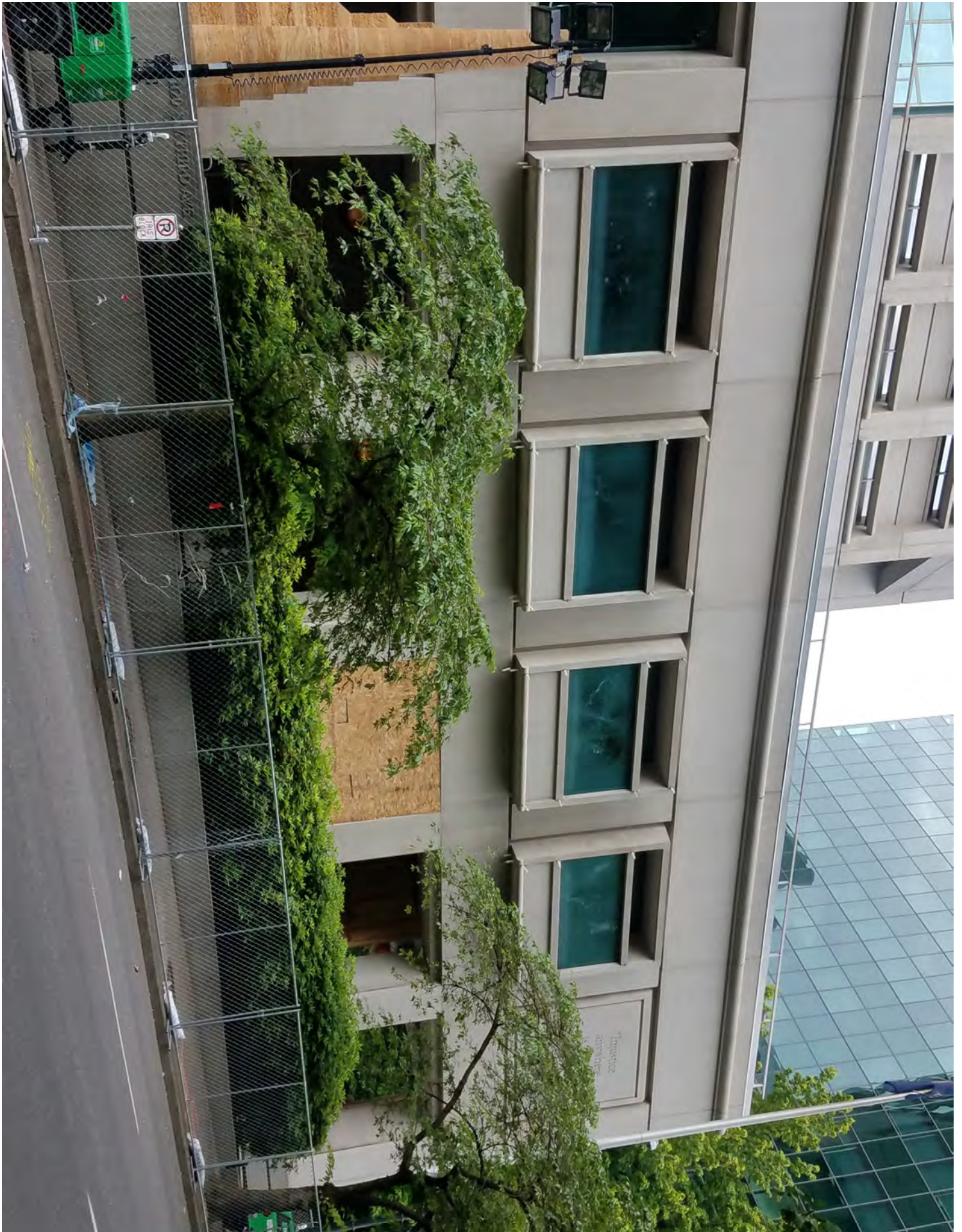












**Exhibit 2**  
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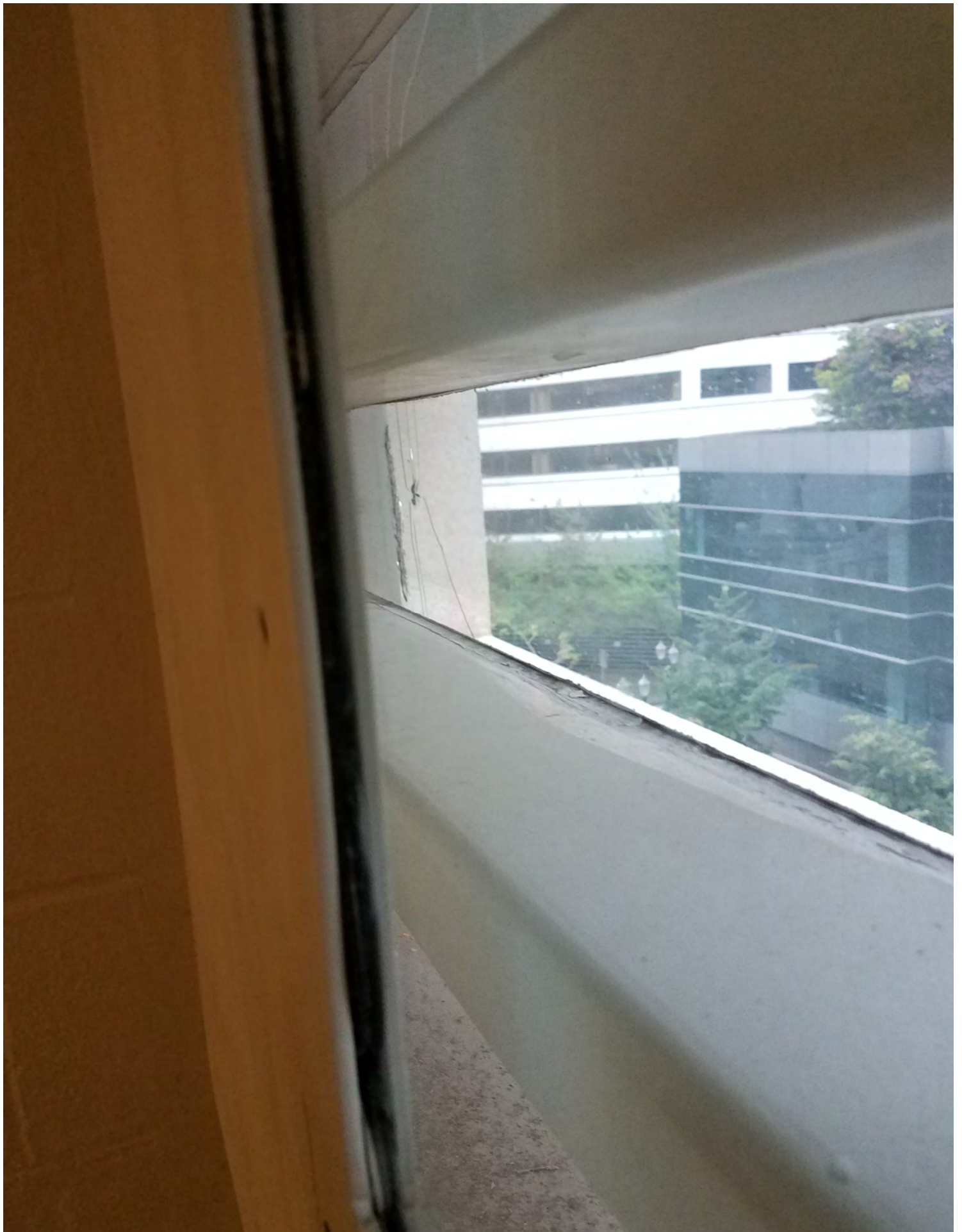


**Exhibit 2**  
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**Exhibit 2**  
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**Exhibit 2**  
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1021

COUNTY  
COURTHOUSE

**EXIT  
ONLY**

ALL PERSONS  
ENTERING THIS BUILDING  
ARE SUBJECT TO A  
SEARCH OF THEIR PERSON  
AND HAND CARRIED ITEMS



COUNTY  
COURTHOUSE

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P-79



HOUSE











